

## **Exhibit C**

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,

Plaintiff,

v.

AMERISOURCEBERGEN DRUG  
CORPORATION, et al.,

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

v.

AMERISOURCEBERGEN DRUG  
CORPORATION, et al.,

Defendants.

Civil Action No. 3:17-01362

Hon. David A. Faber

Civil Action No. 3:17-01665

Hon. David A. Faber

**[PROPOSED] ORDER**

Upon review of the motion filed by the United States (ECF No. \_\_\_\_\_) seeking a protective order, and for good cause shown, it is hereby **ORDERED**:

1. Plaintiffs shall not produce, transmit, or provide copies of documents subject to Special Master Wilkes' Order, dated July 27, 2020 (ECF No. 801) (the SM Order) to any party or non-party pending further order of the Court;
2. The United States shall continue to review all documents subject to the SM Order as expeditiously as possible to identify any material it believes may be withheld pursuant to the law enforcement privilege or other privileges available to the United States;

3. The United States shall submit, no later than 45 days following issuance of this order, a supplemental brief identifying all documents subject to the SM Order that it believes may be withheld pursuant to the law enforcement privilege or other privileges available to the United States and the basis for withholding;

4. In the filing described in Paragraph 3, the United States shall also identify all documents it believes may be produced by Plaintiffs pursuant to an Attorneys-Eyes-Only designation as described in the SM Order; and

5. If appropriate, the United States may file a portion of the supplemental brief described in Paragraph 3 and any exhibits for *in camera* review.

ENTERED: This \_\_\_\_\_ Day of \_\_\_\_\_, 2020

---

**DAVID A. FABER  
UNITED STATES DISTRICT JUDGE**